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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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JUL - 3 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Petition of WorldCom, Inc. Pursuant)
to Section 252(e)(5) of the)
Communications Act for Expedited)
Preemption of the Jurisdiction of the)
Virginia State Corporation Commission)
Regarding Interconnection Disputes)
with Verizon Virginia Inc., and for)
Expedited Arbitration)

CC Docket No. 00-218

In the Matter of)
Petition of Cox Virginia Telecom, Inc.)
Pursuant to Section 252(e)(5) of the)
Communications Act for Preemption)
of the Jurisdiction of the Virginia State)
Corporation Commission Regarding)
Interconnection Disputes with Verizon)
Virginia Inc. and for Arbitration)

CC Docket No. 00-249

In the Matter of)
Petition of AT&T Communications of)
Virginia Inc., Pursuant to Section 252(e)(5))
of the Communications Act for Preemption)
of the Jurisdiction of the Virginia)
Corporation Commission Regarding)
Interconnection Disputes With Verizon)
Virginia Inc.)

CC Docket No. 00-251

**VERIZON VIRGINIA INC.'S OBJECTIONS
TO AT&T'S FOURTH SET OF DATA REQUESTS**

In accordance with the Procedures Established for Arbitration of Interconnection Agreements Between Verizon and AT&T, Cox and WorldCom, CC Docket Nos. 00-218, 00-249, 00-251, DA 01-270, Public Notice (CCB rel. February 1, 2001), Verizon Virginia Inc. ("Verizon") objects as follows to the Fourth Set of Data Requests served on Verizon by AT&T Communications of Virginia ("AT&T") on June 28, 2001.

GENERAL OBJECTIONS

1. Verizon objects to AT&T's Data Requests to the extent that all or any of them seek confidential business information covered by the Protective Order that was adopted and released on June 6, 2001. Such information will be designated and produced in accordance with the terms of the Protective Order.

2. Verizon objects to AT&T's Data Requests to the extent that all or any of them seek attorney work product or information protected by the attorney-client privilege.

3. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence, or otherwise seek to impose upon Verizon discovery obligations beyond those required by 47 CFR § 1.311 et seq.

4. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are overly broad and unduly burdensome.

5. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information from independent corporate affiliates of Verizon Virginia Inc., or from board members, officers or employees of those independent corporate affiliates, that are not parties to this proceeding.

6. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information relating to operations in any territory outside of Verizon Virginia Inc. territory.

7. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek discovery throughout the Verizon footprint. This proceeding involves only Verizon Virginia Inc. and relates only to the terms of interconnection and resale in Virginia. Moreover, as the Commission has assumed the jurisdiction of the Virginia State Corporation Commission in this matter, it has no jurisdiction over Verizon entities that do not conduct business in Virginia. See Memorandum Opinion and Order, In the Matter of Petition of AT&T Communications of Virginia, Inc. for Preemption Jurisdiction of the Virginia State Corporation Commission Pursuant to Section 252(E)(5) of the Telecommunications Act of 1996, CC Docket No. 00-251 (January 26, 2001).

8. Verizon objects to AT&T's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is confidential or proprietary to a customer, CLEC or other third party. Verizon has an obligation to safeguard such information from disclosure. Thus, while Verizon may be in possession of such information, it does not have the authority to disclose that information to AT&T or any other entity.

SPECIFIC OBJECTIONS

In addition to the foregoing General Objections and without waiver of same, Verizon objects specifically to AT&T's Data Requests as follows:

ITEM: AT&T 4-1 Provide Verizon-Virginia line counts, by wire center, for residential, business, single-line business, special access and public lines, in an electronic form to the extent available for the years 1996, 1997, 1998, 1999 and 2000. Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections.

VZ VA #169

ITEM: AT&T 4-2 Provide, by wire center, Verizon-Virginia end of year 2001 and end of year 2002 forecasted line counts for residential, business, single-line business, special access and public lines, in an electronic form to the extent available. Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections.

VZ VA #170

ITEM: AT&T 4-3 Provide statewide Verizon-Virginia forecasted line counts for the next five years (or as many years as are available) for residential, business, single-line business, special access and public lines, in an electronic form to the extent available. Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections.

VZ VA #171

ITEM: AT&T 4-4 Provide the following data for Verizon-Virginia's special access lines, by wire center and total for the state for the years 1996, 1997, 1998, 1999 and 2000 and forecasted for the next five years (or as many years as are available):

- a. DS0 equivalents
- b. Physical pairs equivalents.

REPLY: See General Objections.

VZ VA #172

ITEM: AT&T 4-5 Provide, by wire center, the number of buildings to which Verizon provides service. Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #173

ITEM: AT&T 4-6 Provide, by wire center, the number of customers for which Verizon provides service. Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #174

ITEM: AT&T 4-7 Provide the total route miles of Verizon-Virginia's distribution plant currently in service. Produce any and all documents concerning, referring or relating to the amount of distribution plant currently in service in Verizon Virginia's network.

- a. Provide the total route miles dark fiber currently in Verizon-Virginia's distribution plant. Produce any and all documents concerning, referring or relating to the amount of distribution plant currently in service in Verizon Virginia's network.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #175

- ITEM: AT&T 4-8 Provide the total route miles of Verizon-Virginia's feeder plant currently in service. Produce any and all documents concerning, referring or relating to the amount of feeder plant currently in service in Verizon-Virginia's network.
- a. Provide the total route miles dark fiber currently in Verizon-Virginia's feeder plant. Produce any and all documents concerning, referring or relating to the amount of feeder plant currently in service in Verizon Virginia's network.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #176

ITEM: AT&T 4-9 Please identify the total route miles of Verizon-Virginia's interoffice plant currently in service. Produce any and all documents concerning, referring or relating to the amount of interoffice plant currently in service in Verizon-Virginia's network.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #177

ITEM: AT&T 4-10 Provide the percentage of Verizon-Virginia's total route miles that share both feeder and distribution facilities. Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #178

ITEM: AT&T 4-11 Provide the percentage of Verizon-Virginia's feeder route that also carries distribution facilities (copper cable). Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #179

ITEM: AT&T 4-12 Provide the percentage of Verizon-Virginia's distribution route that also carries feeder facilities (copper and/or feeder cable). Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #180

ITEM: AT&T 4-13 Provide the percentage of Verizon-Virginia loop interoffice route that also carries interoffice feeder facilities (copper and/or fiber cable). Produce any and all documents concerning, referring or relating to the development of these data.

REPLY: See General Objections. Verizon Virginia further objects to this request on the grounds that the requested information is not kept in the normal course of business. Rather, answering this request would require Verizon Virginia to undertake an extraordinarily burdensome and time-consuming study of its physical plant.

VZ VA #181

ITEM: AT&T 4-14 Provide all contracts Verizon has executed over the past three years for the purchase of digital loop carrier equipment.

REPLY: See General Objections.

VZ VA #182

ITEM: AT&T 4-15 Provide all contracts Verizon has executed over the past three years for the purchase of digital loop carrier equipment for its Virginia network.

REPLY: See General Objections.

VZ VA #183

ITEM: AT&T 4-16 Please identify how Verizon believes fiber cable investment should be allocated among all of the services using a fiber sheath. In addition, please answer the following hypothetical: assume the provision of 100 POTS services, 4 ISDN services and 1 DS-1 service on the same fiber, what portion of the fiber investment should be allocated to the POTS services and what portion to the DS1 service? Explain in detail the rationale for the answer.

REPLY: See General Objections.

VZ VA #184

ITEM: AT&T 4-17 Please identify how Verizon believes feeder structure investment should be allocated among all of the services using the feeder structure. In addition, please answer the following hypothetical: assume the provision of 100 POTS services, 4 ISDN services and 1 DS-1 service on (or in) the same feeder structure, what portion of the feeder structure investment should be allocated to the POTS services and what portion to the DS1 service? Explain in detail the rationale for the answer.

REPLY: See General Objections.

VZ VA #185

ITEM: AT&T 4-18 Please identify how Verizon believes common equipment in the digital loop carrier investment should be allocated among all of the services using the digital loop carrier. In addition, please answer the following hypothetical: assume the provision of 100 POTS services, 4 ISDN services and 1 DS-1 service in the same digital loop carrier cabinet, what portion of the digital loop carrier common equipment investment should be allocated to the POTS services and what portion to the DS1 service? Explain in detail the rationale for the answer.

REPLY: See General Objections.

VZ VA #186

ITEM: AT&T 4-19 Please identify how Verizon believes distribution structure investment should be allocated among all of the services using the distribution structure. In addition, please answer the following hypothetical: assume the provision of 100 POTS services, 4 ISDN services and 1 DS-1 service on (or in) the same distribution structure, what portion of the distribution structure investment should be allocated to the POTS services and what portion to the DS1 service? Explain in detail the rationale for the answer.

REPLY: See General Objections.

VZ VA #187

Respectfully submitted,

Karen Zacharia / by *permission*
cwc

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CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T's Fourth Set of Data Requests were served electronically and by overnight mail this 3rd day of July, 2001, to:

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